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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America,
Plaintiff,
v.
Casey Lynn Wells,
Defendant.

Case No. 2:24-mj-00397-DJA
Stipulation and Proposed Order

Ms. Wells was charged by complaint on April 25, 2024, with two counts: (1) Operating a Motor Vehicle while Under the Influence of Alcohol (a violation of 36 C.F.R. § 4.23(a)(1)) and (2) Operating a Motor Vehicle with a BAC of 0.08 Grams and Higher (a violation of 36 C.F.R. § 4.23(a)(2)). (ECF No. 1.)

Ms. Wells entered a plea agreement on October 16, 2024. (ECF Nos. 11, 12.) Under that agreement, Ms. Wells pleaded guilty to Count One. (ECF No. 11.) Count Two was dismissed. (*Id.*) Ms. Wells was sentenced on Count One to one year of unsupervised probation with the following conditions:

1. 51 hours of community service;
2. Attend/ Complete the Lower Court Counseling's DUI Course and Victim Impact Panel;

3. Attend/ Complete an Eight (8) hour online alcohol awareness course;
4. 6-month Restriction from the Lake Mead National Recreation Area;
5. Defendant must not violate any local, state, or federal laws.

(*Id.*) The Court additionally noted that the charge would be reduced to reckless driving upon completion of these conditions:

Should Defendant complete conditions 1, 2, 3, 4 and 5 of unsupervised probation within one (1) year, and has not violated any local, state, or federal laws during that time, the parties agree to jointly move to allow the Defendant to withdraw her guilty plea to Count One. Government will move to amend Count One to a charge of Reckless Driving. The parties will jointly request that the original sentence be applied to the Reckless Driving conviction.

(*Id.*)

At Ms. Wells's request, the Court subsequently modified condition 1 to allow her to pay a \$500 fine and \$10 penalty assessment in lieu of completing 51 hours of community service. (ECF Nos. 13, 14.)

Ms. Wells now has completed the special conditions of her unsupervised probation. Accordingly, the parties agree that Count One should be amended to Reckless Driving, and the status conference set for April 11, 2025 at 11:30 AM should be vacated.

Dated: April 2, 2025

Respectfully submitted,

Rene L. Valladares
Federal Public Defender

Sigal Chattah
United States Attorney

/s/ Rick A. Mula
Rick A. Mula
Assistant Federal Public Defender

/s/ Skyler H. Pearson
Skyler H. Pearson
Assistant United States Attorney

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[Proposed] Order

The Court finds that Ms. Wells has completed the special conditions of her unsupervised probation in accordance with her plea agreement and sentence.

IT IS THEREFORE ORDERED that Ms. Wells is permitted to withdraw her guilty plea to Count One: Operating a Motor Vehicle Under the Influence.

IT IS FURTHER ORDERED that the Court, consistent with the plea agreement and sentence, enters a plea of guilty to Amended Count One: Reckless Driving.

IT IS FURTHER ORDERED that the status conference set for April 11, 2025 at 11:30 AM is vacated.

DATED this 3rd day of April, 2025.

UNITED STATES MAGISTRATE JUDGE